

# Fact Sheet



## For Draft/Proposed Renewal Permitting Action Under 45CSR30 and Title V of the Clean Air Act

Permit Number: **R30-03900101-2016**

Application Received: **July 5, 2016**

Plant Identification Number: **039-00101**

Permittee: **Columbia Gas Transmission, LLC**

Facility Name: **Hunt Compressor Station**

Mailing Address: **1700 MacCorkle Avenue, S.E., Charleston, WV 25314**

*Revised: N/A*

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Physical Location:	105 Patterson Drive, Elkview, Kanawha County, West Virginia
UTM Coordinates:	458.64 km Easting • 4262.67 km Northing • Zone 17
Directions:	From Charleston, take I-79N to Elkview exit, turn left and travel on Secondary Rt. 43 to the town of Frame. Turn left onto Secondary Rt. 37 and station is about 0.75 mile on the left.

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### Facility Description

Columbia Gas Transmission, LLC, Hunt Compressor Station is a natural gas transmission/storage facility covered by a Standard Industrial Classification (SIC) of 4922 and a North American Industrial Classification System (NAICS) of 48621. The station has the potential to operate seven (7) days per week, twenty-four (24) hours per day. The station consists of one (1) 1.56 MMBtu/hr heating system boiler, one (1) 1,100 HP natural gas fired reciprocating engine, and one (1) 132 HP reciprocating engine with generator.

## Emissions Summary

<b>Plantwide Emissions Summary [Tons per Year]</b>		
<b>Regulated Pollutants</b>	<b>Potential Emissions</b>	<b>2014 Actual Emissions</b>
Carbon Monoxide (CO)	11.65	0.05
Nitrogen Oxides (NO <sub>x</sub> )	124.54	0.06
Particulate Matter (PM <sub>2.5</sub> )	2.11	0
Particulate Matter (PM <sub>10</sub> )	2.11	0
Total Particulate Matter (TSP)	2.11	0
Sulfur Dioxide (SO <sub>2</sub> )	0.04	0
Volatile Organic Compounds (VOC)	8.49	0
<i>PM<sub>10</sub> is a component of TSP.</i>		
<b>Hazardous Air Pollutants</b>	<b>Potential Emissions</b>	<b>2014 Actual Emissions</b>
Benzene	0.08	0
Toluene	0.04	0
Ethylbenzene	0.01	0
Xylene	0.01	0
n-Hexane	0.03	0
Formaldehyde	0.35	0
Acetaldehyde	0.33	0
Other HAPs	2.55	0
Total HAPs	3.40	0

*Some of the above HAPs may be counted as PM or VOCs.*

## Title V Program Applicability Basis

This facility has the potential to emit 124.54 TPY of NO<sub>x</sub>. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, Columbia Gas Transmission, LLC is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

## Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

This facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR2	Particulate air pollution from combustion of fuel in indirect heat exchangers.
	45CSR6	Open burning prohibited.

	45CSR11 WV Code § 22-5-4 (a) (14)	Standby plans for emergency episodes. The Secretary can request any pertinent information such as annual emission inventory reporting.
	45CSR30	Operating permit requirement.
	45CSR34	Emissions standards for HAPs
	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
	40 C.F.R. Part 63 Subpart ZZZZ	National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines
State Only:	45CSR4 45CSR17	No objectionable odors. To Prevent and Control Particulate Matter Air Pollution from Material Handling, Preparation, Storage and other sources of Fugitive Particulate Matter

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

### Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit ( <i>if any</i> )
N/A	N/A	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table," which may be downloaded from DAQ's website.

### Determinations and Justifications

#### Reformatting of Permit

The previous Title V renewal for this facility was written in a general permit-style format. With this renewal, this Title V permit has been reformatted in the standard Title V permit format. The source-specific contents of the permit will be described in the following paragraphs.

**Section 4.0: Indirect Natural Gas Boiler less than 10 MMBtu/hr [emission point ID(s): BL2]**

This heating system boiler is rated at less than 10 MMBTU/hr and is subject to 45CSR2. The conditions in this section are summarized below:

Permit Condition	Summary of Condition	Regulatory Citation
4.1.1	Maximum 10% opacity	45CSR§2-3.1.
4.1.2	Compliance with 4.1.1 in accordance with 40 C.F.R. Part 60, Appendix A, Method 9 or by COMS	45CSR§2-3.2.
4.2.1	Visible emissions observation using Method 22.	45CSR§30-5.1.c.

**Section 5.0: 40 C.F.R. 63, Subpart ZZZZ Requirements for 2SLB Reciprocating Internal Combustion Engine(s) RICE [emission point ID(s): E01]**

This engine is a two stroke lean burn, non-emergency engine located at an area source of HAPs with a power rating of 1100 hp. It is subject to the requirements of 40 C.F.R. 63, Subpart ZZZZ. These requirements are included in this section as described below:

Permit Condition	Summary of Condition	Regulatory Citation
5.1.1.	Maintenance requirements	45CSR34; 40 C.F.R. § 63.6603 and Table 2d, Item 6 of 40 C.F.R. 63, Subpart ZZZZ
5.1.2.	General compliance requirements	45CSR34; 40 C.F.R. § 63.6605
5.1.3.	Continuous compliance requirements	45CSR34; 40 C.F.R. § 63.6640(a) and Table 6, Item 9 of 40 C.F.R. 63, Subpart ZZZZ
5.1.4.	Compliance with applicable general provisions	45CSR34; 40 C.F.R. § 63.6665
5.2.1.a.	Operate and maintain the RICE and control device (if any) according to the manufacturer's instructions or develop your own maintenance plan	45CSR34; 40 C.F.R. §§63.6625(e) and (e)(5)
5.2.1.b	Minimize idle time	45CSR34; 40 C.F.R. §63.6625(h)
5.2.1.c	Oil analysis program option	45CSR34; 40 C.F.R. §63.6625(j)
5.4.1.	Records required by Table 6 of 40 C.F.R. 63, Subpart ZZZZ for continuous compliance	45CSR34; 40 C.F.R. §63.6655(d)
5.4.2.	Maintenance records	45CSR34; 40 C.F.R. §§63.6655(e) and (e)(3)
5.5.1.	Report each instance in which the permitted facility did not meet each imitation in Tables 1a and 1b, Tables 2a and 2b, Table 2c, and Table 2d to 40CFR63, Subpart ZZZZ.	45CSR34; 40 CFR §63.6640(b)
5.5.2.	Report each instance in which the permitted facility did not meet the requirements in Table 8 to 40CFR63, Subpart ZZZZ.	45CSR34; 40 CFR §63.6640(e)

**Section 6.0: 40 C.F.R. 63, Subpart ZZZZ Requirements for Emergency Reciprocating Internal Combustion Engine(s) RICE [emission point ID(s): G1]**

This engine is an emergency engine at an area source of HAPs with a power rating of 132 hp. It is subject to the requirements of 40 C.F.R. 63, Subpart ZZZZ. These requirements are included in this section as described below:

Permit Condition	Summary of Condition	Regulatory Citation
6.1.1.	Maintenance requirements	45CSR34; 40 C.F.R. § 63.6603 and Table 2d, Item 5 of 40 C.F.R. 63, Subpart ZZZZ
6.1.2.	General compliance requirements	45CSR34; 40 C.F.R. § 63.6605
6.1.3.	Continuous compliance requirements	45CSR34; 40 C.F.R. § 63.6640(a) and Table 6, Item 9 to 40 C.F.R. 63, Subpart ZZZZ
6.1.4.	Emergency RICE operation	45CSR34; 40 C.F.R. § 63.6640(f)
6.1.5.	Compliance with applicable general provisions	45CSR34; 40 C.F.R. § 63.6665
6.2.1.a.	Operate and maintain the RICE and control device (if any) according to the manufacturer's instructions or develop your own maintenance plan	45CSR34; 40 C.F.R. §§63.6625(e) and (e)(5)
6.2.1.b.	Non-resettable hour meter	45CSR34; 40 C.F.R. §63.6625(f)
6.2.1.c.	Minimize idle time	45CSR34; 40 C.F.R. §63.6625(h)
6.2.1.d.	Oil analysis program option	45CSR34; 40 C.F.R. §63.6625(j)
6.4.1.	Records required by Table 6 of 40 C.F.R. 63, Subpart ZZZZ for continuous compliance	45CSR34; 40 C.F.R. §63.6655(d)
6.4.2.	Maintenance records	45CSR34; 40 C.F.R. §§63.6655(e) and (e)(2)
6.4.3.	Records of hours of operation	45CSR34; 40 C.F.R. §§63.6655(f) and (f)(2)
6.5.1.	Report each instance in which the permitted facility did not meet each limitation in Tables 1a and 1b, Tables 2a and 2b, Table 2c, and Table 2d to 40CFR63, Subpart ZZZZ.	45CSR34; 40 C.F.R. §63.6640(b)
6.5.2.	Report each instance in which the permitted facility did not meet the requirements in Table 8 to 40CFR63, Subpart ZZZZ.	45CSR34; 40 C.F.R. §63.6640(e)

**Non-Applicability Determinations**

The following requirements have been determined not to be applicable to the subject facility due to the following:

- a. *45CSR4—To Prevent and Control the Discharge of Air Pollutants into the Open Air Which Cause or Contributes to an Objectionable Odor or Odors:* This State Rule shall not apply to the following source of objectionable odor until such time as feasible control methods are developed: Internal combustion engines.
- b. *45CSR21—To Prevent and Control Air Pollution from the Emission of Volatile Organic Compounds:* All storage tanks at the station, which are listed as insignificant sources, are below 40,000 gallons in capacity, which exempts the facility from 45CSR§21-28. The station is not engaged in the extraction or fractionation of natural gas, which exempts the facility from 45CSR§21-29.

- c. *45CSR27—To Prevent and Control the Emissions of Toxic Air Pollutants*: Natural gas is included as a petroleum product and contains less than 5% benzene by weight. 45CSR§27-2.4 exempts equipment “used in the production and distribution of petroleum products providing that such equipment does not produce or contact materials containing more than 5% benzene by weight.”
- d. *40 C.F.R. Part 60 Subpart JJJJ—Standards of Performance for Stationary Spark Ignition (SI) Internal Combustion Engine*: All SI engines located at this site were installed before July 12, 2006. Thus, these engines are not subject to 40 C.F.R. Part 60 Subpart JJJJ. [40CFR§60.4230(a)(4)]
- e. *40 C.F.R. Part 60 Subpart OOOO—Standards of Performance for Crude Oil and Natural Gas Production, Transmission, and Distribution for which Construction, Modification, or Reconstruction Commenced after August 23, 2011 and on or before September 18, 2015*: The Storage Vessel requirements defined for transmission sources are not applicable to this site because all vessels commenced construction, or were modified or reconstructed, prior to August 23, 2011 in accordance with 40CFR§60.5365(e).
- f. *40 C.F.R. Part 60 Subpart OOOOa—Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification, or Reconstruction Commenced after September 18, 2015*: The requirements defined by this NSPS are not applicable to this site because all affected sources commenced construction, or were modified or reconstructed, prior to September 18, 2015 in accordance with 40CFR§60.5365a.
- g. *40 C.F.R. Part 60 Subpart Dc—Standards of Performance for Steam Generating Units*: The heating system boiler at this facility is less than 10 MMBtu/hr design heat capacity, which is below the applicability criteria stated in 40CFR§60.40c(a).
- h. *40 C.F.R. Part 60 Subpart K and Ka—Standards of Performance for Petroleum Liquid Storage Vessels*: All tanks at the station are below the applicability criteria of 40,000 gallons in capacity as stated in 40CFR§60.110(a) and §60.110a(a).
- i. *40 C.F.R. Part 60 Subpart Kb—Standards of Performance for Petroleum Liquid Storage Vessels*. All tanks at the station are below the applicability criteria of 19,813 gallons in capacity as stated in 40CFR§60.110b(a).
- j. *40 C.F.R. Part 60 Subpart KKK—Standards of Performance for Equipment Leaks of VOC from Onshore Natural Gas Processing Plants*. The station is not engaged in the extraction or fractionation of natural gas liquids from field gas, the fractionation of mixed natural gas liquids to natural gas products, or both. As a result, the station has no affected sources operating within this source category.
- k. *40 C.F.R. Part 63 Subpart HHH—National Emission Standards for Hazardous Air Pollutants from Natural Gas Transmission and Storage Facilities*. The station is not subject to Subpart HHH since there are no affected dehydration units utilized at this site. Additionally the site is a minor HAP source.
- l. *40 C.F.R. Part 64—Compliance Assurance Monitoring*: The compliance assurance monitoring provisions of Part 64 are not applicable due to there being no add-on controls at this facility. [40CFR§64.2(a)(2)]

### **Request for Variances or Alternatives**

None.

### **Insignificant Activities**

Insignificant emission unit(s) and activities are identified in the Title V application.

### **Comment Period**

Beginning Date: Monday, August 15, 2016  
Ending Date: Wednesday, September 14, 2016

### **Point of Contact**

All written comments should be addressed to the following individual and office:

Rex Compston, P.E.  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304  
Phone: 304/926-0499 ext. 1209 • Fax: 304/926-0478  
[Rex.E.Compston@wv.gov](mailto:Rex.E.Compston@wv.gov)

### **Procedure for Requesting Public Hearing**

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

### **Response to Comments (Statement of Basis)**

Not applicable.